FCC Part 15 Subpart J – Class A (industrial/commercial equipment)

Requesting: Relaxing regulations to allow low volume and/or custom electronic products to be sold without meeting existing FCC Part 15 requirements.

- Cost-benefit considerations
  - Low volume production of an electronic device/product is a low margin business. If the product takes off then paying for testing is not a problem. If not, paying for testing on a product adds to the cost, time, materials and subcontractors like assembling SMT pcbs or pcb Fab this discourages the effort/cost.
- Experience gained from the implementation of the rule
  - In my career designing many electronic products for broadcast television/editing, store and forward telecommunications equipment, LED test systems, audio annunciators, highway traffic sensors, and more… I have taken many products through FCC part 15 certification. In these cases the company I worked for paid the cost of testing and reports. As a consultant I would have designed and manufactured products that would be low volume based a request for a unit from a client. Knowing the limited market for these products and having to expend more capital for FCC testing before having a sale discouraged me from taking the risk on these products.
- Marketplace and technological changes
  - When the rule was adopted single sided or two layer pcbs were common. Now multilayer pcbs are common. The difference is that multilayer boards can be quieter than a similar design that is two sided. Also, SMT tends to keep trace lengths short and optimizing impedances can reduce unwanted radiation.
- Regulation as barrier to entry to the communications marketplace
  - For low volume/custom electronics for commercial/industrial use additional upfront costs are a deterrent.
- Changes in the broader regulatory context
  - When considering the cost/benefit of testing for low volume products used in a commercial/industrial (Class A) environment considering the volume would be low what are the real risk that is being mitigated. In the commercial/industrial settings if I built a electronic assembly tester and when the operator turns it on an AM radio picks up a little static for a few yards away? The people involved are smart enough to either accept the interference or call the builder of the tester and complain… And maybe there would be 5, 10 or 100 of these across the entire country?
- Changes in, or other implications of, the governing legal framework
- Other considerations relevant to the retrospective review of Commission rules